

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DR. JUDY WOOD on behalf of the §
UNITED STATES OF AMERICA §
§
Plaintiff, §
§
vs. §
§
SCIENCE APPLICATIONS §
INTERNATIONAL CORP.; APPLIED §
RESEARCH ASSOCIATES, INC.; §
BOEING, NuSTATS; COMPUTER §
AIDED ENGINEERING ASSOCIATES, §
INC.; DATASOURCE, INC.; §
GEOSTAATS, INC.; GILSANZ §
MURRAY STEFICEK LLP; HUGHES §
ASSOCIATES, INC.; AJMAL ABBASI; §
EDUARDO KAUSEL; DAVID PARKS; §
DAVID SHARP; DANIELE VENEZANO; §
JOSEF VAN DYCK; KASPAR WILLIAM; §
ROLF JENSEN & ASSOCIATES, INC.; §
ROSENWASSER/GROSSMAN §
CONSULTING ENGINEERS, P.C.; §
SIMPSON GUMPERTZ & HEGER, INC.; §
S. K. GHOSH ASSOCIATES, INC.; §
SKIDMORE, OWINGS & MERRILL, §
LLP; TENG & ASSOCIATES, INC.; §
UNDERWRITERS LABORATORIES, §
INC.; WISS, JANNEY, ELSTNER §
ASSOCIATES, INC.; AMERICAN §
AIRLINES; SILVERSTEIN PROPERTIES; §
and UNITED AIRLINES, §
§
Defendants. §

Case No. 07CV3314

**CERTIFICATION OF
PHILIP C. SEMPREVIVO**

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I, **PHILIP C. SEMPREVIVO**, an attorney duly admitted to the bar of this Court, declare pursuant to 28 U.S. C. § 1746 and under penalty of perjury under the laws of the United States of America, that the following statements are true and correct:

1. I am a member of Biedermann, Reif, Hoenig & Ruff, P.C., attorneys for defendant UNDERWRITERS LABORATORIES, INC. ("UL") in the within matter. As such, I have reviewed the pleadings and our files in this matter and, based on our analysis of the same, I am familiar with the facts set forth herein.

2. I submit this Certification in support of defendant UL's Motion for Rule 11 Sanctions and Memorandum of Law In Support of Motion for Rule 11 Sanctions, pursuant to Rule 11(c) of the Federal Rules of Civil Procedure.

3. Attached hereto is a true and complete copy of the QUI TAM COMPLAINT and JURY DEMAND filed by Plaintiff/Relator on April 25, 2007, labeled Exhibit A.

4. Attached hereto is a true and complete copy of the QUI TAM COMPLAINT and JURY DEMAND filed by Morgan Reynolds on May 31, 2007, labeled Exhibit B.

5. Attached hereto as Exhibit C, are copies of articles and press releases concerning this case, the Reynolds case, and the Relator's complaints against NIST. Notably, several of the press releases provide links to Mr. Leaphart's email address and Relator's own website.

6. Attached hereto are true and complete copies of information from the Scholars for 9/11 Truth website, including its full group membership list and associate member list, and various press releases, labeled Exhibit D.

7. Attached hereto are true and complete copies of documentation providing information regarding Relator's Counsel, Mr. Leaphart's own speaking engagements promoting the common

agenda between Mr. Leaphart and the Relator in the above captioned action, Ms. Wood, labeled Exhibit E.

8. Attached hereto are true and complete copies of various pages from the Relator's website, "www.drjudywood.com," labeled Exhibit F.

9. UL respectfully refers the Court to Defendant UNDERWRITERS LABORATORIES, INC.'s Memorandum of Law In Support of Motion for Rule 11 Sanctions attached herein, and requests that the Court award it attorneys' fees and expenses due to the frivolous nature of the Relator's Complaint. As discussed fervently in the Memorandum of Law In Support of Motion for Rule 11 Sanctions by Defendant UL, the Relator's Complaint lack any merit in both fact and law. Clearly, the Relator's Complaint has no chance of success as it is premised upon outlandish theories and baseless allegations.

WHEREFORE, for all the foregoing reasons, in addition to all of the arguments set forth in the UL Motion for Rule 11 Sanctions and Memorandum of Law In Support thereof, defendant Underwriters Laboratories, Inc. seeks an Order:

- (A) Imposing sanctions brought pursuant to Rule 11 of the Federal Rules of Civil Procedure;
- (B) awarding Underwriters Laboratories, Inc. attorneys' fees and expenses; and
- (C) granting such other and further relief as this Court deems just and proper.

Dated: New York, New York
March 18, 2008

Respectfully submitted,

BIEDERMANN, REIF, HOENIG & RUFF, P.C.

By: 

Philip C. Semprevivo, Jr. (PS 1526)

570 Lexington Avenue
New York, New York 10022
(212) 697-6555
psemprevivo@brhr.com

*Attorneys for Defendant Underwriters
Laboratories, Inc.*